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June 1, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Piedmont Natural Gas Company, Incorporated for Approval to Suspend
Routine Meter Testing for the Remainder of 2020
Docket No. 2020-137-G

Dear Ms. Boyd:

By this letter, the South Carolina Office of the Regulatory Staff (“ORS”) hereby notifies the Public Service Commission of South Carolina (“Commission”) that ORS has reviewed the filing submitted by Piedmont Natural Gas Company, Incorporated (“Piedmont” or “Company”) for a Petition for Approval to Suspend Routine Meter Testing for the Remainder of 2020.

Overview of Company’s Request

The Company engages in routine testing of its in-service meters pursuant to Rule 103-475 to ensure that the meters are achieving overall accuracy. Piedmont’s statistical periodic meter sampling program (“Program”) is in addition to the meter testing that is required by the Commission rules. Piedmont’s Program was most recently approved by the Commission in Order No. 2015-623 in Docket No. 2015-272-G.

The Program tests active meters that are serving customers which are at least ten years old and which have not otherwise been tested in the last ten years. Meters are removed from the customer’s home or business to perform testing at Piedmont’s centralized meter shop, and a replacement meter is immediately installed. A Piedmont

employee may need to enter the customer's home or business to locate the active meter, briefly stop gas service, remove the existing meter, install a replacement, relight pilots, and perform safety checks.

ORS Recommendation

Due to the current pandemic COVID-19, Piedmont is requesting the Commission for approval to suspend the Program's testing for the remainder of 2020. The Company states that it intends to resume the Program beginning in 2021, assuming COVID-19 is no longer posing a threat in the Company's service territory. The Company also notes that it has no cause for concern that suspension of the Program for the remainder of 2020 will harm customers or increase the Company's overall operational risk. Based on its review, ORS does not object to the Company's request to suspend the Program during COVID-19. A temporary suspension of the Program will reduce the spread of COVID-19 by eliminating direct interactions between customers and PNG employees.

Please do not hesitate to contact me.

Very truly yours,

s/ Jeffrey M. Nelson

Jeffrey M. Nelson

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)